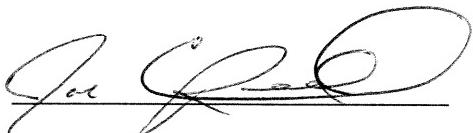


Declaration of Joe Crandall on behalf of Wells Fargo Bank as Mr. Thomas W Lovegrove & BayWatch Development Corporation's Personal Banker and Corporate Loan Officer.

1. I am Joe Crandall
2. I am employed by Wells Fargo Bank, N.A. as a Senior Loan Officer.
3. I have the authority to process Corporate Lending products such as loans, lines of credit and credit cards.
4. Between July of 2012 and October of 2013, Mr. Lovegrove came in to the office to apply for credit to help his business.
5. Based on revenue from contracts that were shared with us, Mr. Lovegrove applied for a credit line, that was intended to lead to multi-million dollar commercial credit lines to support BayWatch Development Corporation.
6. We received credit reports showing that Ocwen was reporting negative credit remarks. Based on this, and only this, Wells Fargo denied the commercial credit application.
7. Attached is the denial notice.

I make this declaration, under penalty of perjury, pursuant to 28 U.S.C. 1746 and that the foregoing is true and correct.



April 7, 2015

Joe Crandall, Senior Loan Officer

Wells Fargo Bank, N.A.

120 W Virginia Ave

Vinton, VA 24179

540-857-3737

Joseph.crandall1@wellsfargo.com

EXHIBIT D